




CRIMINAL COMPLAINT

United States District Court		DISTRICT of ARIZONA	
United States of America		DOCKET NO.	
v. Sarina Ingram ; DOB: 1995; United States Michelle Wilson ; DOB: 1993; United States		MAGISTRATE'S CASE NO. 19-02132MJ	
Complaint for violation of Title 8, United States Code §§ 1324(a)(1)(A)(ii), 1324(a)(1)(A)(v)(I), & 1324(a)(1)(B)(i); 1325; 18 USC § 2			
COMPLAINANT'S STATEMENT OF FACTS CONSTITUTING THE OFFENSE OR VIOLATION:			
<p>COUNT 1 (Felony) On or about July 10, 2019, at or near Bisbee, in the District of Arizona, Sarina Ingram and Michelle Wilson, named herein as defendants and conspirators, did knowingly and intentionally combine, conspire, confederate, and agree with each other and other persons, known and unknown, to transport and harbor certain illegal aliens, including Felipe Perez-Gonzalez, Dario Contreras-Sanchez and Abelino Guerrero-Garcia, and did so for the purpose of private financial gain; in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(ii); 1324(a)(1)(A)(v)(I) and 1324(a)(1)(B)(i).</p> <p>COUNT 2 (Misdemeanor) On or about July 10, 2019, at or near Bisbee, in the District of Arizona, Sarina Ingram and Michelle Wilson, did unlawfully aid and abet certain illegal aliens, including Felipe Perez-Gonzalez, Dario Contreras-Sanchez and Abelino Guerrero-Garcia, to elude examination and inspection by Immigration Officers of the United States of America; in violation of Title 8, United States Code, Section 1325 and Title 18, United States Code, Section 2.</p>			
BASIS OF COMPLAINANT'S CHARGE AGAINST THE ACCUSED:			
<p>On or about July 10, 2019, at or near Bisbee, in the District of Arizona, United States Border Patrol Agents (BPA) observed possible Undocumented Aliens (UDAs) load into a white car near Hereford Road and State Route 92 (SR 92). BPA maintained visual of the vehicle, as it traveled eastbound on SR 92, and BPA relayed information to the Tactical Operation Center (TOC). Agents in TOC gained visual of the vehicle near mile marker 345 using Remote Video Surveillance System and relayed location information to BPAs in the field. BPA passed the vehicle while they were heading westbound, so they turned around to head eastbound and follow the truck. BPA observed three people in the backseat of the vehicle. Record checks revealed that the 2017 Nissan Sentra was registered to an address out of Phoenix, Arizona. BPA conducted a vehicle stop and identified the driver as Sarina Ingram and the front seat passenger as Michelle Wilson, both United States citizens. BPA observed three adult males, all wearing camouflage pants. BPA determined that the three passengers, later identified as Felipe Perez-Gonzalez, Dario Contreras-Sanchez and Abelino Guerrero-Garcia were in the United States illegally.</p> <p>Material witnesses Perez-Gonzalez, Contreras-Sanchez and Guerrero-Garcia stated that they made arrangements to be smuggled into the United States for money. The witnesses stated they crossed the International Boundary Fence and walked until they reached the highway. The witnesses were told a white car would pick them up. Perez-Gonzalez, Guerrero-Garcia identified Ingram as the driver and Wilson as the passenger from a photo lineup. Contreras-Sanchez identified Wilson as the passenger from a photo lineup</p>			
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MATERIAL WITNESSES IN RELATION TO THE CHARGE: Felipe Perez-Gonzalez, Dario Contreras-Sanchez and Abelino Guerrero-Garcia			
DETENTION REQUESTED		SIGNATURE OF COMPLAINANT	
COMPLAINT REVIEWED by AUSA CHR/kj 			
Being duly sworn, I declare that the foregoing is true and correct to the best of my knowledge.		OFFICIAL TITLE & NAME: U.S. Border Patrol Agent	
Sworn to before me and subscribed in my presence.			
SIGNATURE OF MAGISTRATE JUDGE ¹⁾ 		DATE July 11, 2019	

1) See Federal rules of Criminal Procedure Rules 3 and 54

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In a post-*Miranda* statement, **Ingram** stated that she lives and works in Phoenix, Arizona. **Ingram** stated her boss asked her to pick up some people that they could use as laborers. **Ingram** stated her boss told her to go to the Shell gas station and the people would be waiting for her there. **Ingram** did not have a car, so she asked her friend, **Wilson**, if she could borrow her car. **Ingram** stated when she arrived at the gas station she did not see anyone waiting for a ride, so she called her boss who gave **Ingram** another set of coordinates. **Ingram** entered the coordinates on her phone and followed the directions. **Ingram** stated she saw three people on the side of the highway near the coordinates that she received and pulled over. **Ingram** stated the men were wearing regular clothing. **Ingram** stated that she was doing this as part of her job and she was going to be paid \$12.00 per hour, and planned on claiming at least six hours of work for today's job. **Ingram** stated she knew she was going to pick up Mexicans and assumed they were friends or family of her boss.

In a post-*Miranda* statement, **Wilson** stated she helped **Ingram** deliver tile to someone, and after they delivered the tile **Ingram** offered her money to borrow her car to drive from Goodyear, Arizona to Tucson, Arizona to pick up some people. **Wilson** agreed to let **Ingram** drive her car and decided to go with her. **Wilson** stated they drove past Tucson and arrived in Sierra Vista. **Wilson** stated **Ingram** was communicating with someone over the phone and they had to make multiple stops, each time they stopped they received directions to another place. **Wilson** stated the last set of directions took them to an intersection and **Ingram** pulled over and three men wearing camouflage came out of the brush and got in the back seat of the car. After they got in the car **Ingram** started driving and they were pulled over by BPA a few minutes later.